

# COMMUNICATIONS ADVISORY COUNSEL LLC

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February 1, 2008

***Via electronic filing***

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
Report Due February 1, 2008

Dear Madam Secretary:

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits the attached report regarding its progress in meeting the 95% ALI-compliant handset penetration requirement.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,

  
Sylvia Lesse

Counsel for South Canaan  
Cellular Communications Company, LP

cc: \* Derek Poarch, Chief, Public Safety & Homeland Security Bureau, FCC  
\* Jeff Cohen, Public Safety & Homeland Security Bureau, FCC  
Mr. Bernie Swartwood, Pike County Communications  
Mr. Marty Hedgelon, Wayne County E911 Coordinator

\*via electronic mail

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, DA 07-1217 (rel. Mar.9, 2007) ("Order").

**REPORT OF SOUTH CANAAN  
CELLULAR COMMUNICATIONS COMPANY, L.P.**

Due February 1, 2008

Pursuant to the Commission's *Order*<sup>1</sup> granting South Canaan Cellular Communications Company, L.P. ("South Canaan") an extension until September 30, 2007 to achieve the goal of 95% penetration of ALI-capable handsets among its subscribers, South Canaan submits this following progress report:

**(1) Number and status of Phase II requests received from PSAPs (including those the carrier may consider invalid):**

South Canaan received a valid Phase II request from Pike County and provides Phase II service to this county. South Canaan initiated the provision of Phase II services to its Pike County service area on February 28, 2005. Phase I service was initiated in Wayne County on April 26, 2006 and the Company received a Phase II request from Wayne County in March, 2007 and is waiting for Wayne County to finalize its deployment plan.

South Canaan received a Phase II request from the Monroe County PSAP, which, although not physically within its service territory, receives E911 information from three sites within South Canaan's service territory in Pike County. South Canaan initiated the provision of Phase II services to this PSAP on March 26, 2006.

**(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by its network:**

South Canaan initiated the provision of Phase II services to Pike County on February 28, 2005 and to Monroe County on March 26, 2006. South Canaan Cellular is transmitting Phase II data to the Wayne County PSAP today, although the Wayne County PSAP, not yet Phase II compliant, does not process this information. South Canaan is prepared to support Wayne County when the county is ready to deploy Phase II.

**(3) The status of its coordination efforts with PSAPs for alternative 95% handset penetration dates**

South Canaan continues to coordinate regularly with the PSAPs for both Pike and Wayne Counties. Both administrators have been informed that extensions of the 95% handset penetration date have been granted by the Commission. Open channels of communications exist to ensure that any new or developing concerns are addressed.

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, DA 07-1217 (rel. Mar. 9, 2007) ("*Order*").

**(4) Efforts to encourage customers to upgrade to location-capable handsets:**

Although South Canaan has achieved the benchmark 95% penetration rate, it continues to remind customers of the benefits associated with upgrading handsets through a bill message, outbound telemarketing and direct mail.

The Company also continues to run two significant promotions to attract new business and encourage handset upgrades. First, South Canaan has a “Test Drive” campaign which would allow analog handset users to try ALI-capable digital handsets with no phone or local wireless service cost for 30 days. At the end of the promotion period, the trial phone must be returned or the customer will incur regular cellular service expenses per the trial service application agreement. Secondly, the Company currently offers a free ALI-capable handset with any new activation or upgrade for plans starting at \$49.99 per month.

**(5) Percentage of customers with location-capable phones:**

Currently, slightly more than 95% of South Canaan direct customers utilize compliant phones.<sup>2</sup>

**(6) Status in achieving compliance and whether it is on schedule to meet the revised deadline; comparison with other Tier III carrier compliance efforts**

As previously reported, South Canaan achieved the benchmark 95% penetration rate on October 1, 2007.

South Canaan's efforts to achieve the 95% penetration rate compared favorably with the efforts of other Tier III carriers. For example, the out-bound call campaign of a Tier III carrier cited with approval by the Commission is similar to South Canaan's own outreach program, targeted to analog users and offering a free phone in return for a 2-year service commitment.<sup>3</sup> Similarly, South Canaan reduced, then eliminated, the requirement for a customer to commit to a new contract term in exchange for a free compliant phone, a measure which has proven to be productive for other carriers.<sup>4</sup>

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<sup>2</sup> Approximately 50% of the system's users are TracFone resale customers.

<sup>3</sup> *Request for Waiver of Location-Capable Handset Penetration Deadline by Sprint Nextel Corporation*, WT Docket No. 05-286, *Order*, FCC 06-183, ¶ 32 (rel. Jan. 5, 2007) (“*Sprint Nextel Order*”). Puerto Rico Telephone Company dba Verizon Wireless offered: (1) a choice between two free GPS-compliant handsets with the renewal of the customer’s contract; (2) a one-year contract term rather than two years; and (3) 100 free minutes per month for three months. The Commission noted that other carriers have offered free upgrades without requiring an additional contract commitment. *Id.*

<sup>4</sup> *Id.*

# DECLARATION OF CAROLYN COPP

I, Carolyn Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "Report of South Canaan Cellular Communications Company, L.P. due February 1, 2008." The facts stated therein are true and correct, to the best of my knowledge, information and belief.

1 February 2008  
Date

Carolyn Copp  
Carolyn Copp